

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Olon Industries, Inc.
Attn: Ernie Savariano
411 Union Street
Geneva, Illinois 60134

Application No.: 73040806
Applicant's Designation:
Subject: Coating Lines
Date Issued: August 28, 2000
Location: 411 Union Street, Geneva

I.D. No.: 089035AAK
Date Received: December 5, 1997
Expiration Date: August 28, 2005

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three coating lines (Lines C, D and E) applying polyester coating and one coating line (Line F) applying melamine coating pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM)). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Emissions of VOM and operation of the above equipment shall not exceed the following limits:

<u>Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
3 Polyester Coating Lines	1.45	14.45	1.45	14.45
Melamine Coating Line	0.37	3.66	<u>0.37</u>	<u>3.66</u>
	Total		1.82	18.11

These limits define the potential emissions of VOM and are based on maximum solvent usages, maximum VOM content, and limits as requested by the company. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus

the preceding 11 months.

- b. This permit is issued based on the facility using only water or acetone as a cleanup solution. A permit change will be required for the use of any other cleanup solution.

3. Pursuant to 35 Ill. Adm. Code 218.204(c), the VOM content of all coatings as applied in the three coating lines (Lines C, D, and E) applying polyester coating and one coating line (Line F) applying melamine coating shall not exceed 2.3 pounds per gallon (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator.
- 4a. The Permittee shall promptly notify the Illinois EPA of noncompliance with 35 Ill. Adm. Code 218.204(c), in accordance with 35 Ill. Adm. Code 218.211(c)(3).
- b.
 - i. Within 30 days of applying a coating on Lines C, D, E, and F with a VOM content greater than 0.79 lb/gallon, as determined from a Material Safety Data Sheet or other formulation data, the Permittee shall analyze a representative sample of the coating for VOM content in accordance with 35 Ill. Adm. Code 218.105(a) and submit a copy of the results to the Illinois EPA.
 - ii. On an annual basis thereafter, the Permittee shall analyze representative samples of the coating containing more than 0.79 lb VOM/gallon used on Lines C, D, E, and F and submit a copy of the results to the Illinois EPA.
5. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
6. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
7. The Permittee shall maintain monthly records of the following items:
 - a. Amount of each coating and solvent used on each coating line (tons/month and tons/year);
 - b. VOM and HAP content of each coating and solvent used on each coating line (lb VOM/gallon);
 - c. Calculations of VOM emissions. The following equation shall be used to calculate VOM emission:

Where:

$$T_e = \sum_{j=1}^m \sum_{i=1}^n (A_i B_i)_j$$

T_e = Total VOM emissions from all coating lines each month in units of lbs/month or tons/month;

m = Number of coating lines at the source;

j = Subscript denoting an individual coating line;

n = Number of different coatings and solvents as applied each month on each coating line;

i = Subscript denoting an individual coating and solvent;

A_i = Weight of VOM per volume of each coating, and solvent (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each month on each coating line in units of lbs VOM/gallon; and

B_i = Volume of coatings and solvents as applied each month on each coating line in units of gallons/month.

- d. Calculations of HAP emissions. The following equation shall be used to calculate HAP emissions:

$$T_h = \sum_{j=1}^m \sum_{i=1}^n (A_i B_i)_j$$

Where:

T_h = Total HAP emissions from all coating lines each month in unit of lbs/mo or t/mo;

m = Number of coating lines at the source;

j = Subscript denoting an individual coating line;

n = Number of different coatings and solvent as applied each month on each coating line;

i = Subscript denoting an individual coating and solvent;

A_i = Weight of HAP per volume of each coating and solvent as applied each month on each coating line in units of lbs HAP/gal; and

B_i = Volume of each coating and solvent as applied each month on each coating line in units of gal/mo.

8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: coating usage, coating VOM and HAP content of each solvent and coating used (lb/gallon), calculations of as applied coating VOM content (lb/gallon, and calculation of VOM and HAP emissions from the prior

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calendar year. If there has been no exceedance of a requirement of this permit during the prior calendar year, the annual emission report shall contain a statement to that effect.

If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:TNE:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from Coating Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

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2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

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